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April 12, 1991

VIA FAX

Steven C. Parrish, Esq.
Vice President and General Counsel
Philip Morris U.S.A.
120 Park Avenue
New York, New York 10017

Re: ETS [EPA]

Dear Steve:

We are advised that Eilein Claussen, Director, Office of Atmospheric and Indoor Air Programs of the Environmental Protection Agency provided information at recent EPA meetings which may have been substantially along the lines of the following:

* CONCERNING ETS:
  - ORD is in the process of redrafting the ETS risk assessment. Anticipated completion this summer. Policy guide will come soon afterwards.
  - ETS is clearly different from other indoor air contaminants. EPA knows something about tobacco. EPA doesn't know as much about other sources.
* Concerning indoor air generically and health effects information that is being developed, OMB remains concerned.
* Concerning indoor air legislation, timing remains uncertain, but 1992 is probable. OSHA will not have a major role, either in development or implementation.
* In the present process, OSHA is expected to take EPA's research results and provide an implementation program as appropriate. An example, ETS. OSHA has accepted and is a willing participant in this role.

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* Within EPA, the budget has grown over the last three years primarily within the Office of Toxic Substances. In 1992, indoor air for OAR will have a specific program budget.

* Bob Axelrad is the division director with responsibility for the indoor air program and the source for specific technical information; John German is the Technical Branch Chief; Lisa Feldman is responsible for public outreach.

* Present work is guidance oriented. They are presently preparing:

  ° a guide for architects, and

  ° a guide for building managers.

  These guides are being prepared in a cooperative environment. For example, AIA is doing part of the work on the guide for architects; no fee.

* Present focus is building related rather than chemical specific. For example, the guidance will include humidifiers and possible problems associated with improper maintenance.

* The program is planning a major initiative for implementation in 1993.

* They see no tie between the recent Clean Air Act Amendments and the Indoor Air Program.

* The Indoor Air Program is now housed in Crystal City. The balance of the program will be moving to Judicial Square, 501 Third Street. Time not yet determined.

* EPA is not using any indoor air models, yet. But, they are anticipating that some will be evaluated.

* Indoor air outreach:

  ° "If you are going to do something, do it right", is the message. Put in proper ventilation, etc. There is a list of publications available. Those can be obtained from Bob Axelrad.

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The foregoing may or may not add to the flow of information regarding the EPA. To the extent any new information is noted, it should be re-emphasized that the foregoing is at present unconfirmed.

Sincerely,

Leo P. Dreyer

LPD:jpm

cc: Dr. Thomas Borelli
Dr. Robert Pages
Ms. Amy Millman

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